

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	
Amendment of Sections 15.35 and 15.253 of the)	ET Docket No. 11-90
Commission's Rules Regarding Operation of)	RM-11555
Radar Systems in the 76-77 GHz Band.)	
)	
Amendment of Section 15.253 of the)	
Commission's Rules to Permit Fixed)	ET Docket No. 10-28
Use of Radar in the 76-77 GHz Band.)	
)	

REPLY COMMENTS OF AUTOLIV ACTIVE SAFETY SYSTEMS

Autoliv Active Safety Systems division of Autoliv Inc. submits these reply comments in response to the Notice of Proposed Rulemaking (Notice)¹ in the above-captioned proceeding.

Autoliv's Position on the Proposals

In the Notice, the Commission proposed to eliminate the existing requirement that vehicular radars decrease power when the vehicle on which the radar is mounted is stopped, or not in motion. The Commission also proposed to expand the authorization for unlicensed 76-77 GHz band radars to allow their use in fixed infrastructure systems.

In comments submitted July 18, 2011, Autoliv supported the proposal to eliminate the power limitation for stopped vehicles, but opposed the proposal to allow fixed radars in the 76-77 GHz band. Autoliv reaffirms its position on these two proposals and notes that there is substantial opposition but minimal, if any, support in the record for fixed operation in the 76-77 GHz band.

¹ Notice of Proposed Rulemaking in ET Dockets No. 10-28 and 11-90, released May 25, 2011; 76 Fed. Reg. 35176 (June 16, 2011).

In addition, Autoliv supports the comments of the Strategic Automotive Radar Frequency Allocation Group (“SARA”) submitted on July 18, 2011.

Finally, Autoliv opposes the proposals in the comments of the National Radio Astronomy Observatory, which are contrary to the public interest because they would impose significant costs and public safety harms on the public with no countervailing public benefits.

Respectfully Submitted,

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